UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 28 1999

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Craig Timmerman, Staff Engineer
Geosafe Corporation
2952 George Washington Way
Richland, WA 99352-1615

Dear Mr. Timmerman:

I am responding in writing to your letter of September 11, 1998. I had previously communicated my response orally.

In the rule of December 6, 1994, EPA proposed to include vitrification, microencapsulation, and other forms of solidification as disposal technologies which could be used without a disposal approval in the self-implementing cleanup of bulk PCB remediation waste. EPA finalized the rule including only soil washing as an option for the self-implementing disposal of bulk PCB remediation waste. EPA made this decision after reviewing the comments submitted on the proposed rulemaking and considering EPA's experience in the evaluation of disposal approval applications.

EPA still believes that vitrification can be a safe and effective method to dispose of PCBs in bulk PCB remediation waste. EPA has provided for the potential use of this kind of technology by two regulatory pathways, both of which require disposal approvals from EPA. The first pathway is a risk based disposal approval in accordance with §761.61(c). The second pathway is an approval of an alternate destruction method, which performs equivalent to incineration, in accordance with §761.60(e). Geosafe's current PCB disposal approval follows this second pathway.

The Geosafe §761.60(e) approval remains in effect until October 31, 2000, prior to which time Geosafe may apply for a renewal. In issuing the permit, EPA evaluated all aspects of the vitrification process including an on-site demonstration on PCB-containing soil. The evaluation included the collection of fugitive emissions and the analysis of these emissions for PCBs and the products of incomplete combustion of PCBs. EPA found that the Geosafe vitrification operations result in disposal of

CONCURRENCES								
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PCBs equivalent to incineration and, when operated in accordance with the conditions of the approval, pose no unreasonable risk of injury to health or the environment.

Sincerely,

John H. Smith, Ph.D.
Chemist